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BEFORE THE ARIZONA CORPORATION COMMISSION

JIM IRVIN
CARL J. KUNASEK
TONY WEST

RECEIVED
AZ CORP COMMISSION
Chairman
Commissioner
Commissioner
FEB 19 1 41 PM 1999

IN THE MATTER OF U S WEST)
COMMUNICATIONS, INC'S)
COMPLIANCE WITH §271 OF THE)
TELECOMMUNICATIONS ACT OF)
1996)

Docket No. T-0000B-97-0238
DOCUMENT CONTROL
SPRINT'S RESPONSE
TO USW'S SGAT

T-1651B-99-0068

Sprint Communications Company L.P. (Sprint) hereby provides the following in response to the filing of a Statement of Generally Available Terms and Conditions (SGAT) by U S WEST Communication, Inc. (USW).

1. Although USW relies in part on the SGAT filing for compliance with its §271 obligations, the SGAT was not served on parties to this proceeding when it was filed with the Commission on February 5, 1999. Sprint requested a copy of the filing from USW's counsel on February 8, 1999, and did not receive it until February 16, 1999.¹ Consequently, Sprint has had limited opportunity to review and evaluate the filing.

2. Sprint has, however, reviewed "AT&T and TCG's Motion to Reject US WEST's Statement of Generally Available Terms and Conditions" and generally agrees with and joins in that motion to reject USW's SGAT filing. In particular, it is evident that the SGAT does not fully comply with the requirements contained in the Federal Communications Commission rules that have been reinstated by the Supreme Court. As spelled out in the AT&T and TCG Motion, those deficiencies are clear and indisputable. The SGAT therefore cannot be relied on to show compliance with USW's obligations under §271. Consequently, Commission consideration of

Arizona Corporation Commission
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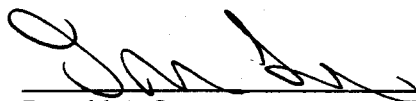
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the SGAT would be an inefficient use of the Commission's scarce time and resources. The Commission should instead reject the SGAT so that USW may, if it chooses, revise it to be in full compliance with the FCC rules and USW's obligations under §§251, 252 and 271 of the Telecommunications Act of 1996.

Respectfully submitted,

SPRINT COMMUNICATIONS COMPANY L.P.



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Certificate of Service

The undersigned hereby certifies that a copy of the foregoing was served by sending a copy thereof to the attached service list on this 19th day of February, 1999.



¹ In view of the likely voluminous filings and brief response times, USW should be required to serve all matters in this proceeding by overnight mail on out-of-town parties so that Sprint is not handicapped in its participation in this matter. Sprint will file a formal motion to request this requirement if necessary.